

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

RUSSELL, ET AL.,

Plaintiffs,

vs.

HARRIS COUNTY, TEXAS, ET AL.,

Defendants

Civil Action No. 4:19-cv-226
The Honorable Lee H. Rosenthal
U.S. District Judge

**RESPONSE IN OPPOSITION TO BAIL BONDSMEN’S MOTION TO INTERVENE BY
JUDGES CHUCK SILVERMAN, BRIAN E. WARREN, AND LORI C. GRAY IN THEIR
OFFICIAL CAPACITY AS JUDGES OF THE 183RD, 209RD, AND 262ND DISTRICT
COURTS, HARRIS COUNTY, TEXAS**

Mario Garza and the Professional Bondsmen of Harris County (“Bondsmen”) do not have a proper legal basis for intervention in this case. In support of this statement, Judges Chuck Silverman (“Judge Silverman”), Brian E. Warren (“Judge Warren”), and Lori C. Gray (“Judge Gray”) adopt the analysis set forth in Plaintiffs’ opposition to Bondsmen’s motion to intervene and join in that opposition. *See generally* Plaintiffs’ Response in Opposition to Bail Bondsmen’s Motion to Intervene (Dkt. No. 282). Furthermore, Judges Silverman, Warren, and Gray specifically reject the Bondsmen’s characterization that their support of bail reform is solely based on policy grounds, as opposed to constitutional or statutory grounds. *See* Motion to Intervene (Dkt. No. 252) at 5. Nor, as the Bondsmen suggest, has any of Judges Silverman,

Warren, or Gray ever employed a felony bail “schedule.” *See* Motion to Intervene (Dkt. No. 252) at 6-8, 16.

Therefore, for the reasons set forth in Plaintiff’s opposition and adopted herein, Judges Silverman, Warren, and Gray respectfully ask the Court to deny the Bondsmen’s motion to intervene.

Respectfully submitted.

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CERTIFICATE OF SERVICE

I certify that on September 10, 2020 a true and correct copy of this document properly was served on counsel of record via electronic filing in accordance with the USDC, Southern District of Texas Procedures for Electronic Filing.

/s/ G. Allan Van Fleet

G. Allan Van Fleet, P.C.